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- 1 metals during that time period of '83 to '86?
- 2 A. There was a small amount. Most of it was
- 3 carried out in the machine shop downstairs and
- 4 they knew how to handle it, and what they would
- 5 do is run coolant and there was machining and
- 6 that. They knew how to do it. But we didn't do
- 7 it.
- 8 Q. Okay. So Department 3670 did not work with
- 9 beryllium metal?
- 10 A. No; no, not machining or anything like that.
- 11 The only beryllium metal that we had were
- 12 beryllium tools because they're nonmagnetic, and
- 13 when you're working with big magnets, if you use
- 14 a magnetic tool, you go to tighten a nut or
- 15 something and the wrench would stick to a
- 16 magnet, so the nonmagnetic tools were used
- 17 because they're nonmagnetic. But other than
- 18 that, that's the only thing we used - beryllium.
- 19 Q. So just to clarify that, you might have used
- 20 some beryllium containing tools in your process,
- 21 but you didn't --
- 22 A. Wrenches.
- 23 Q. Okay, wrenches.

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- 1 A. Wrenches.
- 2 Q. In particular --
- 3 A. And things like that, but I couldn't think of
- 4 anything that Suzanne would possibly use them on
- 5 because she didn't work on that sort of stuff.
- 6 Most of that was too heavy for women anyway
- 7 because the magnets weighed a ton.
- 8 Q. Was your department during that time period or
- 9 any time in the '80's ever involved with the
- 10 Agis project?
- 11 A. Agis?
- 12 Q. Agis.
- 13 A. I don't know what the Agis project is.
- 14 MR. UBERSAX: Isn't it Agis?
- 15 MS. LINDEMANN: Egis. Excuse me.
- 16 Thank you.
- 17 Q. Egis.
- 18 A. Egis? I still don't know what it is.
- 19 Q. Okay; good.
- 20 A. That was --
- 21 Q. Thank you. You seem to have a fairly distinct
- 22 recollection of Suzanne Genereux.
- 23 A. Yes.

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- 1 Q. And I was wondering if there was anything in
- 2 particular about her that makes her more
- 3 memorable to you than maybe some of your other
- 4 employees.
- 5 A. She's tough. When she was -- like when she
- 6 transferred to the inspection department, we
- 7 couldn't get nothing through inspection. She
- 8 nitpicked everything to death. She was a pain.
- 9 I had to go to her foreman and tell her, back
- 10 off. I mean, she just created problems and I
- 11 went to her foreman and had to tell her to back
- 12 off so we could get stuff through inspection,
- 13 stuff that had -- was next to perfect, you know,
- 14 and she was -- she was tough.
- 15 Q. Did you have similar problems with her when you
- 16 were her supervisor?
- 17 MR. HONIK: Objection to the form.
- 18 A. No. When she worked for me, the ARCO windows
- 19 was like her thing and she did a good job with
- 20 them and she worked, you know, but she's a very,
- 21 how do I say it, strong woman. She says to her
- 22 husband, "jump," he'll say, "how high." That's
- 23 all I can say.

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- 1 MS. LINDEMANN: Thank you, Mr.
- 2 Broadbent. No more questions.
- 3 MR. HONIK: Why don't we go off the
- 4 record just for a minute.
- 5 (Discussion held off the record.)
- 6 FURTHER EXAMINATION
- 7 BY MR. HONIK:
- 8 Q. Mr. Broadbent, good afternoon to you. I know
- 9 this has been a little bit of a long morning and
- 10 I appreciate --
- 11 A. That's all right. As long as I'm out of here.
- 12 I don't want to come back.
- 13 Q. You'll be out of here soon enough.
- 14 A. Okay.
- 15 Q. And I don't anticipate that you'll need to come
- 16 back, but before I ask you some questions of my
- 17 own, I want to remind you about a couple things.
- 18 First of all, I'm an attorney too.
- 19 My name is Rubin Honik and I represent the
- 20 Genereuxs.
- 21 A. Okay.
- 22 Q. And I'm very grateful for your appearance today,
- 23 I know the rest of the lawyers are, for taking

30 (Pages 114 to 117)

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